

# EXHIBIT 7

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NIKE, INC., :  
Plaintiff, : Case No. 22-cv-983  
:  
v. :  
STOCKX LLC, :  
Defendant. :  
----- :

VIDEOTAPE DEPOSITION OF:  
BARBARA DELLI CARPINI  
NEW YORK, NEW YORK  
TUESDAY, JANUARY 10, 2023

REPORTED BY:  
SILVIA P. WAGE, CCR, CRR, RPR  
JOB NO. 5593380

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January 10, 2023

9:41 a.m.

Videotape deposition of BARBARA DELLI  
CARPINI, held at the offices of DEBEVOISE &  
PLIMPTON LLP, 919 Third Avenue, New York, New  
York, pursuant to agreement before SILVIA P.  
WAGE, a Certified Shorthand Reporter, Certified  
Realtime Reporter, Registered Professional  
Reporter, and Notary Public for the States of New  
Jersey, New York and Pennsylvania.

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Q. And then, finally, Topic 40, all harm to Nike stemming from Nike's causes of action in this case.

Are you prepared to testify on behalf  
of Nike on that topic today?

A. Yes.

Q.

Q. And my understanding is you're currently employed at Nike, correct?

A. Correct.

Q. And what is your position?

A. I'm the Vice President for global brand protection and digital IP enforcement and I lead the global brand protection team.

Q. Where are you based?

A. I'm based in Italy.

Q. How long have you been in that current position?

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A. Six years.

Q. And how long have you been at Nike?

A. Since 2005.

Q. Okay. And so why don't you give me a bit of your background at Nike.

What other positions have you held there?

A. Yeah. So I started in 2005 in Nike Italy as brand protection adviser.

(Stenographer clarification.)

A. Nike Italy as brand protection advisor.

After five years I moved to our European headquarters based in the Netherlands as a brand protection associate Counsel.

And after four years, I got promoted to digital IP -- digital brand protection and was leading the global digital effort.

And after that I was promoted to --- in 2016 to global brand protection senior director first and then last year to Vice President global brand protection and digital IP enforcement.

Q. Got it. Thank you.

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Q. And as lead of global brands  
projection, are you head of brand protection?

A. Correct.

Q. And how many people report to you?

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. [REDACTED]

[REDACTED]

[REDACTED]

Q. So how many direct reports do you  
have?

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] And

then Joe Pallett who is --

THE STENOGRAPHER: I'm sorry. You're  
a little fast --

THE WITNESS: Sorry. I can go  
slower.

THE STENOGRAPHER: -- and I'm not  
familiar with your accent.

THE WITNESS: You are right.

THE STENOGRAPHER: I'm so sorry.

THE WITNESS: You are right.

MS. BANNIGAN: Just tell us what you  
need until and so we get it right.

THE STENOGRAPHER: Well, it's  
recorded; but resources reporting to me,  
dedicated to?

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Q. And then how about the head of authentication and innovation?

A. Joe Pallett.

Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. When you say, "business partners,"

what did you mean by that?



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A. No.

Q. Do you understand what I mean by --

A. Yeah.

Q. -- "committee," "working group,"  
"task force"?

A. Yeah.

Q. None that you can think of?

A. No.

Q. So what's the purpose of fighting  
counterfeits at Nike?

A. First of all, it's to protect the  
authenticity of the connection Nike has with its  
own consumers. We -- our team, entire team,  
engages with law enforcement all around the world  
in order to provide the support when it comes to  
detentions or detection or seizures of  
counterfeit products sold or imported or also  
appearing online.

Q. When you say, "it's to protect the  
authenticity of the connection Nike has with its  
own consumers," what do you mean by that,  
specifically?

A. Making sure that we clean the  
marketplace as much as possible from counterfeit

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2 in order to have consumers facing counterfeit is  
3 less as possible in the marketplace.

4 Q. Why is that important?

5 A. It's important because counterfeit  
6 misleads consumers because counterfeit is not a  
7 product that Nike manufactures because it's  
8 something that -- it's a crime that is pursued ex  
9 official almost everywhere and we support that  
10 kind of enforcement.

11 Q. Do counterfeits harm Nike's brand?

12 A. Definitely.

13 Q. How?

14 A. From many ways. Counterfeit can be  
15 of bad quality, so harming health and the  
16 consumer itself. It harms our business because  
17 think of a person who want to buy a pair of shoes  
18 for his son or daughter. Think of a mom buying a  
19 pair of Nike shoes spending a lot of money  
20 because counterfeit can be found at a very high  
21 price and then being misled and thinking that  
22 that's a Nike product. So that's a harm to our  
23 image. And it's also a financial harm because,  
24 obviously, that's a sale that gets away from  
25 Nike.

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2 Q. For the example about the mom being  
3 misled, how does that harm Nike, specifically?

4 A. Someone who buys a product convinced  
5 to be buying a counterfeit and then finding out  
6 later on that it's a counterfeit product  
7 believing that the source of that poor quality  
8 product, for example, is coming from Nike is  
9 definitely harmful to our brand.

10 Q. I see.

11 So it's harmful to your brand if they  
12 don't find out the source because they might  
13 think that the Nike product is low quality?

14 A. Yeah. It can also be a harmful  
15 product based on the (INAUDIBLE.) It's going to  
16 create a damage to the person who uses such  
17 product.

18 Q. And when you say, there's financial  
19 harm to Nike from counterfeits, what do you mean  
20 by that, specifically?

21 A. So there are certain sales of  
22 counterfeit that take away sales from Nike,  
23 obviously. And on top of that, you know, the  
24 damage that counterfeit create to our brand has  
25 also financially impact.

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Q. So financial harm, does that assume that the person who purchased the counterfeits could have purchased the shoes from Nike directly?

A. Yeah.

MS. DUVDEVANI: Objection.

Q. [REDACTED]

MS. DUVDEVANI: Objection.

A. [REDACTED]

Q. What private investigators do you

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2 work with in the United States?

3 A. [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 A. [REDACTED]

10 Q. [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 Q. [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Who is the head of the gray market team?

A. Chira Pizzol.

Q. And do you have an understanding of what a gray market good is?

A. Yeah.

Q. What is it?

A. It's a product that has been sold outside the Nike network.

Q. Does that mean a product produced or manufactured by Nike that's been sold outside of its authorized distribution?

A. Yeah.

Q. [REDACTED]

[REDACTED]

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A.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(Stenographer clarification.)

A.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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A. No.

Q. Okay. Are there certain deviations or issues that are within normal quality control bounds that might come up but they don't signify a counterfeit product?

MS. DUVDEVANI: Objection.

A. So our products go through quality controls. And if they have defect, they are qualified as such. But those are genuine products.

Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

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Q. Okay. What exactly were they looking for from you?

A. [REDACTED]

[REDACTED]

Q. Where or in what context?

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Q.

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2 manager who has been supporting the entire  
3 function with authentication as well.

4 Q. What is her day-to-day role?

5 A. She works under Joe Pallett in  
6 authentication and innovation as well. She's  
7 based out of our European headquarters, just to  
8 clarify.

9 Q. And where is that based?

10 A. In the Netherlands.

11 Q. That's right. You said that. Thank  
12 you.

13 So, if you look at the first page of  
14 this spreadsheet.

15 A. The page, not the cover you are  
16 referring to, right? There was a cover here.

17 Q. Yes, yes, I'm looking at the first  
18 page of the --

19 A. Okay.

20 Q. The first page of the actual  
21 spreadsheet.

22 A. Of the file, okay.

23 Q. Towards the bottom it looks like  
24 [REDACTED]  
[REDACTED]

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A. Uh-huh.

Q. [REDACTED]

A. Uh-huh.

Q. It looks like the first one is 112 and the other one is 113. I just want to make sure we're on the same line here.

A. 112, yes, and 113, yes.

Q. For the shoe at 112, do you know which of any of the asserted trademarks were on this shoe?

MS. DUVDEVANI: Objection.

A. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Q. Okay. And do you know who actually purchased the shoe?

A. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Q. And do you know -- was it Laura Rizza instructing them or somebody from the gray market team?

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2 Q. Why?

3 A. Because our legal department asserted  
4 they must be infringing.

5 (There is a discussion off the  
6 record.)

7 Q. Okay. Are you familiar with the  
8 counterfeiting cause of action in this  
9 litigation?

10 A. Yeah.

11 Q. Has Nike been harmed by the alleged  
12 counterfeiting?

13 A. Yes.

14 Q. How?

15 A. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

24 Q. How, specifically, has Nike's image  
25 been harmed by the sale of the alleged

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2 counterfeits on StockX's website?

3 MS. DUVDEVANI: Objection.

4 A. Nike is always harmed by the sale of  
5 counterfeit products.

6 Q. Can you give me anymore detail?

7 MS. DUVDEVANI: Objection.

8 A. I believe I've answered to this  
9 question already several times. So Nike gets  
10 harmed by counterfeit being sold in the  
11 marketplace because consumers would believe that  
12 those are genuine while they could be harming  
13 consumers along with taking away sales from Nike  
14 as well.

15 Q. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

19 MS. DUVDEVANI: Objection.

20 A. [REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

24 MS. DUVDEVANI: Objection.

25 A. [REDACTED]



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Q. What do you mean by that? How would you quantify it?

A. Based on the number that is sold you will quantify how much damage has been done to Nike.

Q. So do you have a figure --

A. On top of the financial and the image damage to the brand, reputation damage as well will add up, in my view.

Q. Okay. So -- but what I want to try to understand right now is the financial damage.

MS. DUVDEVANI: Objection.

A.

What is the alleged harm to Nike from

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2 Nike's false advertising claim?

3 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 Q. Excuse me, sold on StockX's website.

19 MS. DUVDEVANI: Objection.

20 Q. Let me state that more clearly.

21 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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conduct or existence?

MS. DUVDEVANI: Objection.

A. Can you repeat the question please?

Q. Sure.

Q. Not that you're aware of?

A. I don't know.

Q. Who would know?

A. I guess the business team.

Q. Who?

A. People who looks after the digital sales.

Q. Who, who would that be?

A. I don't know on the top of my mind.

Q.

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MS. DUVDEVANI: Objection.

A.

Q. Have you ever purchased any shoes on StockX?

A. No.

Q.

MS. BANNIGAN: Let's take a five to ten-minute break and I'll see how much more I have left.

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A. To those IP infringements, I rely on the lawyers here who made the determination, as I haven't. I believe I've said that before.

Q. Okay. [REDACTED]

Q. Okay. Now, going back to the counterfeiting and the false advertising claims. I think you mentioned two categories, reputational harm and financial harm, correct?

A. Correct.

Q. [REDACTED]

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MS. DUVDEVANI: Objection.

A.

Q. Okay.

MS. DUVDEVANI: Objection.

A. Repeat the question please.

Q. Okay.

MS. DUVDEVANI: Objection.

A.

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2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. Okay. So your answer is the same as  
7 before, correct?

8 A. Yeah.

9 Q. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 MS. DUVDEVANI: Objection.

14 A. The sale of counterfeit always harm  
15 Nike. I believe I've said this several times.

16 Q. [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED]

19 MS. DUVDEVANI: Objection.

20 A. [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

25 [REDACTED]

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1 HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL EYES ONLY

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 MS. DUVDEVANI: Objection.

8 A. [REDACTED]

9 [REDACTED]

10 Q. If a buyer purchases a counterfeit  
11 shoe from StockX's website and believes that it's  
12 an authentic Nike shoe, does that harm Nike?

13 MS. DUVDEVANI: Objection.

14 A. Yes, it does.

15 Q. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 MS. DUVDEVANI: Objection.

22 THE WITNESS: Sorry.

23 Q. Is that correct?

24 A. Also, correct.

25 Q. [REDACTED]



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MS. DUVDEVANI: Objection.

Q.

Q. Okay.

(Stenographer clarification.)

A.

Q. How are you measuring the harm to Nike based on the false advertising?

MS. DUVDEVANI: Objection.

A. I will defer to our lawyers' determination on that.

Q. Okay. Does Nike believe that StockX's advertising claims increase the number of transactions on StockX's website?

MS. DUVDEVANI: Objection.

A. Please repeat the question. I didn't

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2 Q. You're aware that StockX has made  
3 that claim?

4 A. Yeah.

5 Q. How has Nike been harmed by StockX's  
6 advertising "100 percent verified authentic"?

7 MS. DUVDEVANI: Objection.

8 A. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

15 Q. Okay. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

20 MS. DUVDEVANI: Objection.

21 A. I will defer to what the Counsels  
22 have brought forward with the complaint.

23 Q. So, as you sit here today, [REDACTED]  
[REDACTED]  
[REDACTED]

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[REDACTED]

MS. DUVDEVANI: Objection.

A. [REDACTED]

MS. BANNIGAN: Okay. Let's take five minutes. I might be done.

MS. DUVDEVANI: Okay.

THE VIDEOGRAPHER: The time is 4:50 p.m. and we're going off the record.

(Recess taken 4:52 to 4:59 p.m.)

THE VIDEOGRAPHER: The time is 4:58 p.m. and we're back on the record.

MS. BANNIGAN: I have no further questions.

We do object to the witness's preparation for several of the 30(b)(6) topics, which we can discuss going forward.

Is there any redirect?

MS. DUVDEVANI: There is redirect.

EXAMINATION BY MS. DUVDEVANI:

Q. Okay. If we can go back to, I think, it's Exhibit No. 1.

MS. BANNIGAN: The 30(b)(6) notice?

MS. DUVDEVANI: Yes.

A. Alright.